

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

RICHARD LOWERY,
Plaintiff,

V.

LILLIAN MILLS, in her official capacity as Dean of the McCombs School of Business at the University of Texas at Austin; ETHAN BURRIS, in his official capacity as Senior Associate Dean for Academic Affairs of the McCombs School of Business at the University of Texas-Austin; and SHERIDAN TITMAN, in his official capacity as Finance Department Chair for the McCombs School of Business at the University of Texas-Austin,
Defendants.

CASE NO. 1:23-cv-00129-DAE

DEFENDANTS' WITNESS AND EXHIBIT LISTS FOR THE AUGUST 31, 2023 HEARING

The Court requested the parties to file a live witness list and exhibit list on the docket before the hearing. Below are Defendants' lists.

Live Witnesses if Deemed Relevant and Necessary by the Court

May/Will Call	Witness	Anticipated Time
May	Ethan Burris	15 minutes
May	Richard Lowery	15 minutes

Exhibits

Exhibits to Defendants' Response to Plaintiff's Motion for Preliminary Injunction		
Exhibit Number	Docket Number	Description
1	14-1	Lillian Mills Declaration

2	14-2	Ethan Burriss Declaration
3	14-3	Sheridan Titman Declaration
3a	14-3	August 14, 2022 Email Correspondence
3b	14-3	August 22, 2022 Email Correspondence
3c	14-3	September 24, 2022 Email Correspondence
4	14-4	Change in Rank Form
5	14-5	Dean's Evaluation
6	14-6	Texas Scorecard article, August 11, 2022
7	14-7	Regents Rule 31004
8	14-8	Regents Rule 60101
9	14-9	HOP 3-2031
10	14-10	UTS 138
11	14-11	November 5, 2022 Academic Freedom Panel
11a	14-11	November 5, 2022 Academic Freedom Panel – Transcript
13	14-13	October 21, 2022 Policy Ideas to Fix America's Universities
13a	14-13a	October 21, 2022 Policy Ideas to Fix America's Universities - Transcript
14	14-14	Texas A&M Original Complaint
15	14-15	HOP 2-2310
16	14-16	Regents Rule 31008
17	14-17	Lessons from the Frontlines of the University Wars
17a	14-17a	Lessons from the Frontlines of the University Wars - Transcript
18	14-18	Joseph Bishop Declaration
18a	14-18a	August 24, 2022 Email Correspondence
19	14-19	Gabriela Maria Barake Declaration
19a	14-19a	Insider Higher Ed article, Sept. 24, 2021
19b	14-19b	The College Fix article, Dec. 1, 2021
19c	14-19c	Fox News article, Feb. 18, 2022

19d	14-19d	Campus Reform article Mar. 8, 2022
19e	14-19e	The Texas article, April 18, 2022
19f	14-19f	The Texas Tribune article, June 8, 2022
19g	14-19g	The James G. Martin Center for Academic Renewal article, July 1, 2022
19h	14-19h	Heterodox STEM article, Aug. 5, 2022
19i	14-19i	The College Fix article, Aug. 5, 2022
19j	14-19j	Heartland Daily News article, Aug. 11, 2022
19k	14-19k	Texas Scorecard article, Aug. 11, 2022
19l	14-19l	The College Fix article, Aug. 11, 2022
19m	14-19m	The College Fix article, Aug. 12, 2022
19n	14-19n	The College Fix article, Nov. 5, 2022
20	14-20	Richard Lowery Pay Change History
21	14-21	Custodian of Records Declaration
New Exhibits		
22		Richard Lowery Raise 2023
23		Richard Lowery Reappointment 2023
24		Carlos Carvalho Civitas Bio
25		Def. Lillian Mills's Objections and Responses to Plaintiff's DWQ
26		Def. Sheridan Titman's Objections and Responses to Plaintiff's DWQ
27		Def. Ethan Burris's Objections and Responses to Plaintiff's DWQ
Exhibits to Plaintiff's Motion for Preliminary Injunction		
Exhibit Number	Docket Number	Description
28	8-1	Richard Lowery Declaration
29	8-2	Carlos Carvalho Declaration
30	8-3	Richard Lowery Bio
31	8-4	Salem Center About Us Webpage
32	8-5	2022 Reappointment of Lowery to Salem Center

33	8-6	Lowery Column Dec. 1, 2021
34	8-7	Lowery Column June 28, 2022
35	8-8	McGee Article June 8, 2022
36	8-9	Lowery Column July 1, 2022
37	8-10	CSPI Podcast
38	8-11	Richard Lowery Tweet Aug. 18, 2022
39	8-12	Global Sustainability Leadership Institute Webpage
40	8-13	Richard Lowery Tweet April 11, 2022
41	8-14	Richard Lowery Tweet Aug. 22, 2022
42	8-15	Meeta Email Aug. 22, 2022 3:58:36 PM
43	8-16	Meeta Email Aug. 22, 2022 4:04:16 PM
44	8-17	Meeta Email Aug. 22, 2022 5:57:00 PM
45	8-18	Lowery Email Aug. 22, 2022 5:54 PM
46	8-19	Gove Email Aug. 24, 2022 4:56 PM
47	8-20	Grant Article Oct. 23, 2020
Exhibits to Plaintiff's Reply ISO Motion for Preliminary Injunction		
Exhibit Number	Docket Number	Description
48	17-1	Lowery Suppl. Declaration
49	17-2	Lowery Appointment Letter

Respectfully submitted,

JACKSON WALKER L.L.P.

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CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2023, I caused a copy of the foregoing pleading to be served upon counsel of record for all parties via the Court's ECF system.

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